
From: Wu, Jennifer
To: Allison Castellan - NOAA Federal
Sent: 9/15/2014 10:25:58 AM
Subject: RE: Follow-up request re: NMFS and buffers

Thanks, Allison. I was also trying to see if there was other information for why the management measure was put on in the first place, but I have information from literature about the benefits of buffers.

From: Allison Castellan - NOAA Federal [mailto:allison.castellan@noaa.gov]
Sent: Monday, September 15, 2014 5:59 AM
To: Wu, Jennifer
Subject: Re: Follow-up request re: NMFS and buffers

If NMFS recommended blanket buffers in the past for herbicides, they aren't recommending that now...based on the scientific research that went into their biops, they concluded that buffers (or any restrictions) are not needed for some herbicides.

On Sun, Sep 14, 2014 at 4:23 PM, Wu, Jennifer <Wu.Jennifer@epa.gov> wrote:

Thanks, Allison. I'm also wondering generically beyond the court-ordered buffers, BiOps or litigation, if NOAA has recommended blanket buffers in the past or if there's information on when buffers are necessary. I'm trying to find scientific literature on why states have decided to apply state-wide spray buffers for timber production and not rely solely on FIFRA labels.

From: Allison Castellan - NOAA Federal <allison.castellan@noaa.gov>
Sent: Friday, September 12, 2014 2:12 PM
To: Wu, Jennifer
Subject: Re: Follow-up request re: NMFS and buffers

Jenny--

Talked with Scott Hetch today at NMFS. Here's the gist:

1. Confirmed what I said in my earlier email, no blanket buffer requirements (herbicide specific and BiOps for most completed herbicides don't recommend buffer but other BMPs.
2. NMFS focus was on the "salmon supporting waters"...includes Type F but some Type N that flow directly to Type F. Because they needed to do the BiOps for all NW states, they couldn't rely on state-defined water types since it varied state by state.
2. Some court-ordered buffers are still in place for "salmon supporting waters". See <http://www.oregon.gov/ODA/programs/Pesticides/Water/Pages/Buffers.aspx> for the list. The website doesn't specific which are herbicides and Scott didn't know all off hand, just that some were herbicides. However, I couldn't get EPA's mapper to work for Oregon to display which streams had the buffer requirements.
3. One of the biggest practices NMFS sees make the biggest difference when it comes to avoiding drift is droplet size (the finer the droplet, the more drift) so that's one of the biggest recommendations they have for applicators when they look at spray plans.

Ex. 5 - Deliberative

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Happy to discuss more next week.

Allison

On Thu, Sep 11, 2014 at 4:58 PM, Wu, Jennifer <Wu.Jennifer@epa.gov> wrote:
Allison, I had another question from the pesticide subgroup meeting today for NOAA.

Can you get information from NMFS/NOAA in the Pacific Northwest on why buffers for pesticide application are needed for any stream (preferably Type N, but any stream is okay)? The idea is that Oregon and other states felt the need to go beyond FIFRA for Type F and D streams. Even Oregon put extra buffers on Type N streams for insecticides and fungicides. If there were some guidance from NOAA, such as recommendations for a general 50 foot buffer on all streams for pesticide application, that would be helpful to link the need for buffers in general to fish and aquatic life help.

Thanks! FYI, the follow-up is for the subgroup to pull together some materials, and I'm revising the issues paper for the group to look at. Then we'll meet one last time to vote for approval or disapproval before the managers' meeting. Let me know if you have questions.

From: Wu, Jennifer
Sent: Thursday, September 11, 2014 1:13 PM
To: 'Allison Castellan - NOAA Federal'
Cc: Waye, Don; Carlin, Jayne; Alan Henning
Subject: RE: REVIEW By 9/24: Sept. NWEA Update

Thanks for pulling together, Allison. I had one change for the pesticides piece. I'd rather talk on Monday, September 22, so the subgroup can follow up on a few pieces.

From: Allison Castellan - NOAA Federal [<mailto:allison.castellan@noaa.gov>]
Sent: Thursday, September 11, 2014 6:16 AM
To: Wu, Jennifer
Cc: Waye, Don; Carlin, Jayne; Croxton, Dave; Hall, Lynda; Henning, Alan; Sweeney, Stephen; Byrne, Jennifer; jeff.dillen@noaa.gov; joelle.gore@noaa.gov; Solloway, Chris; Barber, Anthony; Psyk, Christine; Melissa Rada - NOAA Affiliate
Subject: REVIEW By 9/24: Sept. NWEA Update

All--

As discussed on the call yesterday, here's a revised update we'll provide NWEA at the end of the month for your review. Please have any comments back to me by Sept. 24th.

Thanks!
Allison

On Wed, Sep 10, 2014 at 7:25 PM, Wu, Jennifer <Wu.Jennifer@epa.gov> wrote:
Here are some general meeting notes from today's call with action items below. If managers and attorneys are able to comment by the deadlines, that will help the Tech Team stay on schedule. Thanks. - Jenny

Action Items:

1. Allison will draft a new schedule for the tech team to review.
2. Allison will draft the new version of the update to NWEA keeping the content general but responsive. Draft will be sent in the next few days.
3. **OSDS/New Development** – Don will circulate a new rationale for review, including approval language (option 3) and the use of the rule-making authority. Christine, Joelle, Lynda, Steve, Jeff, and JB will RW and give Don comments

by September 18.

4. **Forestry - Riparian Buffers** - Christine, Joelle, Lynda, Steve, Jeff, and JB will RW and give Alan comments by September 10 or as soon as possible.
5. **Forestry - Landslides** - Christine, Joelle, Lynda, Steve, Jeff, and JB will RW and give Alan comments by September 18.
6. **Background on Additional Management Measures** – The Tech Team will provide the managers information on additional management measures and include the relevant 1998 condition in issue subtopic papers. (*Don sent background material after the call, 9/10/14.*)
7. **Additional Management Measures memo**. Jeff will complete a memo regarding additional management measures (*carried forward from Jayne's action items*).

From: Wayne, Don

Sent: Wednesday, September 10, 2014 1:48 PM

To: Carlin, Jayne; Croxton, Dave; Hall, Lynda; Wu, Jennifer; Henning, Alan; Sweeney, Stephen; Byrne, Jennifer; allison.castellan@noaa.gov; jeff.dillen@noaa.gov; joelle.gore@noaa.gov; Solloway, Chris; Barber, Anthony; Psyk, Christine; Melissa Rada - NOAA Affiliate

Subject: Original 1998 language on Oregon's Additional MMs for Forestry and how these MMs were developed

All,

Attached are a couple documents that our managers in particular may find helpful as they review materials from us. Our management has also requested that we include information right up front that presents the actual condition language in our issue-specific documents.

1. A subset of NOAA-EPA's 1998 Conditional Approval Findings Document for Oregon with the Additional Management Measures for Forestry highlighted in yellow. The articulation of the condition is very general in the CONDITIONS section, but very specific in the RATIONALE section.
2. A "Timeline for Oregon's Additional Management Measures for Forestry and Related Documents" assembled from HQ's paper files.

Don Wayne

U.S. EPA - Nonpoint Source Control Branch

Phone: 202-566-1170

<< File: Oregon's Additional Management Measures for Forestry.docx >> << File: Timeline for Oregon's Additional Management Measures, 6-9-2014.docx >>

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